

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NicoleThompsonStevenMcDonald& GlenishaRhone

(In the space above enter the full name(s) of the plaintiff(s).)

**COMPLAINT**

**-against-**

CityofNewYork,TheNewYorkCityPoliceDepartment,  
PoliceOfficerAngelRodriguezShield#12325,SeergeanFinegan,  
Shield#UNKNOWNandPoliceOfficers"JohnandJaneDoe,"Shield  
numbersUNKNOWNall of the43precinct,

Jury Trial: ☒ Yes ☐ No  
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

**I. Parties in this complaint:**

- A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff Name GlenishaRhone  
Street Address 3620BlackdogCt.  
County, City Tavares  
State & Zip Code Fl.,32778  
Telephone Number 718-795-5914

- B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name TheCityofNewYork,byCorporationCounsel  
Street Address 100ChurchStreet

County, City New York,  
 State & Zip Code NY., 10007  
 Telephone Number \_\_\_\_\_

Defendant No. 2      Name The New York City Police Department  
 Street Address 1 Police Plaza  
 County, City New York  
 State & Zip Code NY, 10007  
 Telephone Number \_\_\_\_\_

Defendant No. 3      Name PO Angel Rodriguez, NYPD  
 Street Address 1 Police Plaza  
 County, City Manhattan, N.Y. 1007  
 State & Zip Code \_\_\_\_\_  
 Telephone Number \_\_\_\_\_

Defendant No. 4      Name Sergeant Finegan, NYPD  
 Street Address 1 Police Plaza  
 County, City Manhattan  
 State & Zip Code NY, 10007  
 Telephone Number \_\_\_\_\_

## II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal Questions

☐ Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? 42 USC Section 1983

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship \_\_\_\_\_

Defendant(s) state(s) of citizenship \_\_\_\_\_

## III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? \_\_\_\_\_  
480 East 188 Street, Apt. 16J, Bronx, NY

B. What date and approximate time did the events giving rise to your claim(s) occur? \_\_\_\_\_  
October 17, 2014, at approximately 4am

C. Facts: NYPD officers broke down the apartment door and arrested all of the occupants inside the apartment, including the Plaintiffs. The police were executing a search warrant for Lamon McDonald, who was one of the people in the apartment. Inside Laman's bedroom was found various office equipment, including a desktop computer, monitor, printers, ID card printer, credit card skimmer and blank checks. They also recovered a gun concealed inside a box that was inside a bag at the bottom of a closet. Unless Laman told Plaintiffs that the office equipment was used for forgery-related purposes, they would have any reason to know that the office equipment was anything out of the ordinary. Re: the gun, unless Laman told the Plaintiffs that the gun was hidden where it was, they would have had no way of knowing that the gun was there. The only witnesses were the three Plaintiffs, Laman McDonald and Defendant police officers.

What  
happened  
to you?

Who did  
what?

Was anyone  
else  
involved?

Who else  
saw what  
happened?

#### IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. \_\_\_\_\_

Emotional and physical injuries and loss of employment.

